

The Cross Cascade Pipeline:

A more efficient, more reliable and environmentally safer means of transporting refined petroleum products from Western Washington refineries to Central and Eastern Washington.

The Cross Cascade Pipeline Project is a 231-mile underground petroleum product pipeline proposed by Olympic Pipe Line Company (Olympic). The pipeline will benefit Washington residents by providing a means of transporting refined fuel that is more efficient, more reliable and environmentally safer than the current system of barging and trucking.

Today, two-thirds of all fuel used in Eastern Washington comes from Western Washington. Without the Cross Cascade Pipeline, Washington residents will be placed at greater risks as the volume of fuel barged and trucked increases. Spills from barging could threaten endangered salmon and other aquatic resources, tribal and commercial fisheries, and beaches and parks in and along Puget Sound, the Washington coast and the Columbia River. Barge loading operations also pollute the air in Vancouver and Portland. Tanker truck transportation increases traffic on congested highways and dangerous mountain passes, and tanker truck accidents pose risks to both human safety and the environment.

Olympic Pipe Line Company

Olympic is a common carrier petroleum products pipeline company based in Renton, Washington. For more than thirty-five years, Olympic has operated the pipeline system that transports virtually all of the gasoline, diesel and jet fuel used in Western Washington, and a substantial portion of the petroleum products used in Portland and Vancouver. Olympic is committed to operating both its existing pipeline and the Cross Cascade Pipeline in an

environmentally sound manner. Olympic complies with and exceeds Federal and State regulatory requirements, and continually upgrades its pipeline to improve its operation and minimize the possibility of leaks and spills.

Description of the Project

The Cross Cascade Pipeline will be a 231-mile underground pipeline, transporting gasoline, diesel and jet fuel from Western Washington refineries to Central and Eastern Washington. The proposed route begins near Woodinville in Snohomish County, where it will connect with Olympic's existing pipeline. The route travels east along a BPA corridor, crosses the Snoqualmie River on an existing bridge and proceeds southeast along existing rights of way, trails and roads to a pump station near North Bend. From there, the route crosses Snoqualmie Pass using the railroad tunnel, and continues southeast on existing rights of way, crossing under I-90 near the Indian John Hill Rest Area, and proceeding across the Yakima River. The route travels on existing rights of way north of Ellensburg and south to Kittitas, where a terminal will be constructed adjacent to I-90. From Kittitas, the route continues east and southeast, crossing under I-90 near Vantage. The route then proceeds south, crossing the Columbia River by directional drilling near the Wanapum Dam, and continues east near Othello and south to Pasco, where it will connect with the Northwest Terminal Facility.¹

¹ Application for Site Certification at S-4 to S-5; Claude Harshbarger Direct Testimony (Ex. 7) at 5-7. See attached map of route.

Olympic selected the proposed route taking several factors into account, including construction feasibility, environmental impacts and cost.² More than seventy percent of the proposed route is on or adjacent to existing corridors, which means that construction and operation will result in fewer environmental impacts and less interference with existing land uses.³ Olympic considered several alternative pipeline corridors, including corridors traveling through Snoqualmie, Stevens and Stampede Passes, but concluded that the proposed route best satisfied all of the applicable criteria.⁴

Upon initial construction, the Cross Cascade Pipeline will be capable of transporting 60,000 barrels of refined petroleum products per day. In the future, Olympic will be able to increase the pipeline's capacity to 110,000 barrels a day by constructing three additional pump stations in Kittitas, Grant and Adams Counties.⁵

Pipelines in the United States

In the United States, there are more than 200,000 miles of liquid petroleum pipelines.⁶ Underground pipelines are widely used to transport refined petroleum products

² Application at 2.1-3; Claude Harshbarger Direct Testimony (Ex. 7) at 8.

³ Katy Chaney Direct Testimony (Ex. 7) at 4.

⁴ Claude Harshbarger Direct Testimony (Ex. 7) at 10; see also Application § 9.1; Alternatives Analysis (Ex. 13.1).

⁵ Claude Harshbarger Direct Testimony (Ex. 7) at 7.

⁶ Larry Bennington Rebuttal Testimony (Ex.29) at 22.

because they are safe and efficient.⁷ Indeed, for more than thirty-five years, the existing Olympic Pipe Line system has supplied Western Washington and the Portland/Vancouver area with needed petroleum products.⁸ Shippers prefer to ship petroleum products by pipeline because of safety, reliability and inventory cost concerns.⁹ Certain shippers have already committed to transporting product on the Cross Cascade Pipeline when it is built.¹⁰

Current System of Petroleum Product Distribution

Currently, product from Western Washington refineries is transported to Central and Eastern Washington in three ways:

First, product is transported from the refineries, approximately 300 miles to Portland on the existing Olympic pipeline, where it is transferred onto river barges operated by Tidewater Barge Lines and shipped another 225 miles up the Columbia River to Pasco.

Second, because the existing pipeline is at capacity, some product is transported from the refineries by ocean-going barge or tanker almost 400 miles from the Western Washington refineries, through the Strait of Juan de Fuca, and along the Washington coast to Portland. From Portland, it is reloaded onto barges for shipment another 225 miles up the Columbia River to Pasco.

Third, product is transported by tanker truck from Western Washington across the Cascade Mountains to Central and Eastern Washington.¹¹

⁷ Larry Bennington Rebuttal Testimony (Ex. 29) at 22.

⁸ Application at S-1.

⁹ Frank Hopf Rebuttal Testimony (Ex. 6) at 4.

¹⁰ Frank Hopf Direct Testimony (Ex. 5) at 9.

¹¹ Application at S-2. See attached map illustrating the current system.

Some product also reaches Eastern Washington markets from Rocky Mountain refineries. In 1996, the Yellowstone pipeline transported approximately 23,000 barrels per day of product from refineries in Billings to Spokane, and the Chevron pipeline transported approximately 6500 barrels per day of product from refineries in Salt Lake City to Pasco.¹² In recent years, however, demand in Billings and Salt Lake City has increased, leaving less product available to ship to Eastern Washington.¹³ Indeed, Chevron has recently announced its intention to discontinue shipments from Salt Lake City to Pasco, and reverse the direction of its line to deliver product from Pasco to Boise.¹⁴

In 1996, more than 38,000 barrels of fuel a day were transported by pipeline, ocean-going barge and/or tanker from the Western Washington refineries to Portland, and then upriver by barge.¹⁵ Almost 14,000 barrels of fuel a day were transported by tanker truck from Western Washington to destinations in Central and Eastern Washington.¹⁶ The amount of product transported by barges and trucks from Western Washington to Central and Eastern Washington is expected to increase in the future as demand in Central and Eastern Washington increases, and shipments from Rocky Mountain refineries decline. By 2019, almost 63,000 barrels of fuel a day are likely to be transported via pipeline and barge to

¹² Application at S-3.

¹³ Paul Rolniak Direct Testimony (Ex. 9) at 8-9.

¹⁴ Paul Rolniak Rebuttal Testimony (Ex. 10) at 6.

¹⁵ Frank Hopf Direct Testimony (Ex. 5) at 9-10.

Portland and then barged up river, and more than 21,000 barrels are likely to be transported by truck to Central Washington.¹⁷ Once the Cross Cascade Pipeline is built, however, much of the product currently transported to Central and Eastern Washington by truck and barge will be transported by pipeline.¹⁸

EFSEC's Role

The Washington Legislature established the Energy Facility Site Evaluation Council (EFSEC) in order to create a centralized process for permitting large energy projects. In doing so, the Legislature acknowledged the "present and predicted growth in energy demands in the State of Washington" and recognized "the pressing need for increased energy facilities." RCW 80.50.010; accord WAC 463.14.020.

In this permitting process, EFSEC is to "balance the increasing demands for energy facility location and operation in conjunction with the broad interests of the public." RCW 80.50.010. The balancing is to be based on the following premises:

- (1) To assure Washington state citizens that, where applicable, operational safeguards are at least as stringent as the criteria established by the federal government and are technically sufficient for their welfare and protection.
- (2) To preserve and protect the quality of the environment; to enhance the public's opportunity to enjoy the esthetic and recreational benefits of the air, water and land

¹⁶ Frank Hopf Direct Testimony (Ex. 5) at 10.

¹⁷ Frank Hopf Direct Testimony (Ex. 5) at 12-13.

¹⁸ E.g. Frank Hopf Direct Testimony (Ex. 5) at 7; Application at S-3. See attached illustration.

resources; to promote air cleanliness; and to pursue beneficial changes in the environment.

(3) To provide abundant energy at reasonable cost.

This is a permitting process, not a civil lawsuit. Although the Council conducts an adjudicatory hearing, there are no causes of action, elements of claims, or burdens of proof. Instead, the Council should consider the Application and accompanying reports, the evidence presented during the hearing, comments provided at public hearings, and information generated during the environmental review process. Based on the totality of that information, the Council balances the benefits and impacts of the proposed project in light of the considerations outlined above, and imposes certification conditions necessary to minimize adverse environmental impacts. RCW 80.50.010.

The Cross Cascade Pipeline Furthers the Public Interest

The Pipeline will Save \$400 Million in Transportation Costs.

Transporting product from the Western Washington refineries to Pasco by pipeline will be 40% cheaper than the existing method of transporting product.¹⁹ University of Washington Professor Keith Leffler, Ph.D., has estimated the associated cost savings to be more than \$400 million over the next twenty-five years.²⁰ Everyone benefits when transportation costs are reduced. Reduced costs encourage price competition, which

¹⁹ Frank Hopf Direct Testimony (Ex. 5) at 8, 12; Frank Hopf Rebuttal Testimony (Ex. 6) at 3.

ultimately benefits consumers.²¹ Indeed, Professor Leffler concludes that "a significant portion of the over \$400 million in savings over the next twenty five years will go into the pockets of consumers in the Eastern Washington supply area."²²

The Pipeline Will Provide More Reliable Transportation of Petroleum Products.

Pipelines offer a consistent and reliable means of transporting product from place to place. In contrast, the current system of transporting product by barge and truck is highly variable. Heavy snow, high winds, icing of the rivers, river lock repairs, and river drawdowns can interrupt the supply of petroleum products to Central and Eastern Washington.²³

Transporting Product By Pipeline Will Reduce the Risk of Environmentally Damaging Product Spills.

Whatever the method of transporting petroleum product, there is a risk of product being released into the environment. The Cross Cascade Pipeline, however, would substantially reduce the distance that petroleum products travel to reach Eastern Washington, substituting a 230-mile pipeline trip for the current system of transporting product 500-625

²⁰ Keith Lefler Rebuttal Testimony (Ex. 42) at 6.

²¹ Frank Hopf Rebuttal Testimony (Ex. 6) at 7.

²² Keith Lefler Rebuttal Testimony (Ex. 42) at 12.

²³ Frank Hopf Rebuttal Testimony (Ex. 6) at 6.

miles by pipeline and/or barge via Portland.²⁴ Even if pipelines and barges were of comparable safety, the proposed pipeline would substantially reduce the risk of spills by reducing the distance traveled and reducing the number of product transfers.²⁵

In fact, pipelines are safer than barges. The Cross Cascade Pipeline is expected to reduce the number of spills by approximately 400 spills, and reduce the volume of product spilled by approximately 335,000 gallons.²⁶ More significantly, the Cross Cascade Pipeline will reduce the risk of spills into the marine/aquatic environment. All spills from barges and tankship occur in the water, but spills from a pipeline almost always occur on land.²⁷ In part for this reason, University of Idaho professor Ernest Brannon, Ph.D., concluded that the risk to salmon and other aquatic life from the proposed pipeline is "very much lower than the risk associated with the alternative of using the present transport system by water."²⁸

The Pipeline Will Reduce The Environmental Risks Associated With River Barge Transportation.

Transporting product by river barge creates the risk of petroleum product spills in the Columbia River. Barge transportation on the Columbia River is particularly risky due to

²⁴ Frank Hopf Direct Testimony (Ex. 5) at 4.

²⁵ Larry Bennington Rebuttal Testimony (Ex. 29) at 23.

²⁶ John Robinson Rebuttal Testimony (Ex. 32) at 4.

²⁷ John Robinson Rebuttal Testimony (Ex. 32) at 6-7; see also Larry Bennington Rebuttal Testimony (Ex. 29) at 23.

²⁸ Ernest Brannon Rebuttal Testimony (Ex. 37) at 11.

variant water flows, extreme wind, narrow ship channels and other ship traffic ²⁹ Over time, significant spills are inevitable,³⁰ and spills on the river are typically very difficult to clean up.³¹ Spills in the Columbia River create the risk of damage to critical habitat and sensitive resources, including endangered salmon species.³²

Petroleum barging operations on the Columbia River also create substantial air quality problems in the Portland/Vancouver area. Each day as much as 5.7 tons of VOCs are emitted from barge loading operations at three Portland area terminals. For this reason, the Oregon Department of Environmental Quality has included the Cross Cascade Pipeline project as part of its Portland Area Ozone Maintenance Plan.³³

The Pipeline Will Reduce Risks Associated with Barge Transportation in Puget Sound and Along Washington's Coast.

Since Olympic's existing pipeline system reached capacity in the early 1990s, additional product from Western Washington refineries has been shipped to Portland by ocean-going barges. As demand increases in the future, the number of barges will continue to increase if the Cross Cascade Pipeline is not built. On a typical voyage, these barges pass

²⁹ Harold Zarling Rebuttal Testimony (Ex. 33) at 3.

³⁰ Harold Zarling Rebuttal Testimony (Ex. 33) at 4.

³¹ Harold Zarling Rebuttal Testimony (Ex. 33) at 6.

³² Ernest Brannon Rebuttal Testimony (Ex. 37) at 5-7.

³³ Martha Moore Rebuttal Testimony (Ex. 44) at 5; see also Katy Chaney Direct Testimony (Ex. 12) at 7.

through difficult and treacherous waters, including Puget Sound, the Strait of Juan de Fuca, the outer coast, the Columbia River bar and the lower Columbia River.³⁴ There are numerous examples of problems with barge transportation in these areas. In 1994, a barge spilled 26,900 gallons of diesel oil into Puget Sound. In 1988, a barge sank near Anacortes, spilling 63,000 gallons of heavy cycle gas oil, and in the same year, the tank barge NESTUCCA collided with its tug, releasing 231,000 gallons of fuel oil. Recent incidents involving the NEW CARISSA and the ORIENT EXPRESS "barge at large" illustrate the risks of barge transportation in Puget Sound and along Washington's coast.³⁵

The risk of these types of incidents is particularly problematic in light of the endangered species and sensitive resources found in Puget Sound and along the Washington coast.³⁶ A spill along the coast could threaten important tribal fishing interests, commercial and sport fishing areas, and state parks.³⁷

The Pipeline Will Reduce Dangerous Tanker Truck Traffic.

Currently, approximately 60 to 70 fuel-carrying tank trucks obtain fuel from Seattle's Harbor Island distribution facility each day and cross the Cascade Mountains to deliver it to

³⁴ John Felton & Paul Gallagher Rebuttal Testimony (Ex. 34) at 18; Philip Meyer Rebuttal Testimony (Ex. 31) at 5.

³⁵ John Felton & Paul Gallagher Rebuttal Testimony (Ex. 34) at 7-18.

³⁶ Ernest Brannon Rebuttal Testimony (Ex. 37) at 5-7; Philip Meyer Rebuttal Testimony (Ex. 31) at 9.

³⁷ Philip Meyer Rebuttal Testimony ("Meyer") (Ex. 31) at 10-13.

points in Central and Eastern Washington.³⁸ While pipelines rank as the safest means of transporting petroleum products, tanker trucks rank fourth behind pipelines, barges and rail.³⁹ Tanker truck accidents almost always occur on busy highways, exposing both the truck operator and the public to extreme hazards. Tanker truck accidents are likely to result in both environmental damage and the loss of human life.⁴⁰

The Cross Cascade Pipeline Will Free Up Capacity on the Existing Western Washington Pipeline.

Olympic's existing Western Washington pipeline system is currently operating at capacity from Renton to Portland. A significant amount of the petroleum product transported on the existing system is ultimately trucked from Harbor Island to Central Washington or barged up the river from Portland to Pasco. The proposed Cross Cascade Pipeline would free up capacity along the existing system, to serve the projected growth in Western Washington.⁴¹

The Cross Cascade Pipeline Will Create Jobs and Economic Benefits.

Construction of the pipeline will result in jobs as well as increases in personal income and sales taxes resulting from the purchase of goods and materials. The direct and indirect income accruing during construction has been estimated at \$58 million. Local jurisdictions

³⁸ Frank Hopf Direct Testimony (Ex. 5) at 5.

³⁹ Application at S-7 (citing California Fire Marshall Report).

⁴⁰ John Robinson Rebuttal Testimony (Ex. 32) at 7.

will receive a total of over \$300,000 in property taxes from the pipeline.⁴² The pipeline will also benefit Eastern Washington farmers by reducing fuel transportation costs and may reduce grain transportation costs as a result of increased barge and tug capacity on the Columbia River.⁴³ These economic benefits are all in addition to the \$400 million savings in fuel transportation costs.

Cross Cascade Pipeline Has Been Designed for Safe Operation

Olympic has designed the proposed pipeline, terminal, pump stations and related facilities to meet or exceed all federal and state regulatory requirements as well as pipeline industry standards.⁴⁴

Pipe: The pipeline will be constructed of high strength, carbon steel pipe. It will have a minimum yield strength of at least 52,000 psi and will satisfy specifications exceeding the industry standard API 5L.

Wall Thickness: Pipe will have a minimum thickness of 0.250 inches for the 12-inch segment and 0.281 inches for the 14-inch thickness, with thicker walled pipe used for road, rail, bridge, stream and river crossings.

⁴¹ Frank Hopf Direct Testimony (Ex. 5) at 8-9.

⁴² Katy Chaney Direct Testimony (Ex. 12) at 9.

⁴³ James Jones Rebuttal Testimony (Ex. 41) at 4-5.

Pipe Coating: Pipe will be coated with 40 mils of polyethylene. Fusion-bonded epoxy, powercrete and concrete coating will be used in certain locations for added protection.

Cathodic Protection: The pipeline will be protected from corrosion by an impressed current cathodic protection system. Olympic will routinely monitor the cathodic protection system with pipe-to-soil surveys and rectifier monitoring.

Valves: All mainline valves will be designed to operate remotely, and will be located above ground, surrounded by impervious soil and berms or dikes.

Depth: The pipeline will be constructed at a minimum depth of 4 feet, and at two feet below projected scour depth at stream crossings. For HDD crossings, the pipe will be located at least 20 feet below river bottom.

Welds: The pipeline will be constructed using Shielded Metal Arc Welding. 100% of welds will be inspected radiographically.

Hydrostatic Test: Olympic will conduct an 8-hour hydrostatic test of the entire pipeline at 125% of maximum operating pressure. Olympic will also test pipe segments to be used on all major stream and river crossings prior to installation.

⁴⁴ The following features of the pipeline design and operation are addressed in Claude Harshbarger Direct Testimony (Ex. 7) at 5; Larry Bennington Rebuttal Testimony (Ex. 29) at 4-10, 12-13; see also Application § 2.3.2 and § 2.9.

Internal Inspection: Olympic will conduct an internal line inspection following initial startup, and at least every five years thereafter. These inspections permit the detection of damage on the line. Olympic will monitor internal corrosion control with corrosion coupons.

Surveillance: Olympic will conduct aerial surveillance of the pipeline route on a weekly basis, weather permitting, and will regularly monitor the physical condition of the right of way. Olympic will also conduct aerial surveillance of stream crossings after every 5-year storm event, and ground surveillance at each high risk stream crossing after a 5-year flood event.

SCADA & PLDS: Olympic will operate the pipeline using a sophisticated Supervisory Control and Data Acquisition (SCADA) system. The system scans thousands of data points every 5-6 seconds, and allows Control Center operators to detect any irregularities in pressures, flow or other measurements. Olympic will also utilize a computerized Pipeline Leak Detection System (PLDS) developed by Modisette & Associates. The dynamic computer model constantly monitors parameters measured by the SCADA system and compares those to modeled values to determine whether a leak or spill has occurred. The system has proven capable of detecting a release of 0.5% of flow within 15 minutes, and is capable of detecting smaller releases over longer periods of time.

Static Tests: Olympic will conduct monthly static tests of the entire pipeline, and quarterly static tests of individual segments of the line by isolating segments between block valves.

Community Outreach: Olympic will conduct outreach programs to encourage third-parties to notify Olympic of unusual conditions, post markers along the right of way providing a toll-free telephone number to report concerns, and participate in the One-Call system.

Olympic Will Avoid, Minimize and Mitigate Environmental Impacts

In constructing a project of this magnitude, some impacts to the environment are unavoidable. Olympic's environmental consultants, however, have devoted more than 35,000 hours evaluating the potential impacts associated with the project and working with Olympic to avoid, minimize and mitigate impacts.⁴⁵ Section 1.4 of the Application for Site Certification details the mitigation measures that will be implemented.

Geotechnical Issues: Areas of mass wasting have been avoided where possible. Engineering measures will be implemented to reduce the risk of pipeline damage in the event of mass wasting and to ensure that construction does not result in mass wasting. Consistent with industry practice, additional site-specific investigations will be conducted prior to final design and construction.⁴⁶ Best Management Practices will be used to minimize and control

⁴⁵ Katy Chaney Rebuttal Testimony (Ex. 13) at 3.

⁴⁶ Application § 2.15.7.

erosion and sedimentation.⁴⁷ The pipeline does not cross any mapped active earthquake faults, and will be constructed in order to allow ground movement without rupturing.⁴⁸

Stream and River Crossings: The pipeline will cross 154 streams or rivers and 61 drainage ditches or irrigation canals. Most streams or rivers will be crossed using non-invasive drilling methods or existing bridges. When Olympic employs more invasive methods, it will utilize Best Management Practices to minimize sedimentation and damage to shoreline vegetation.⁴⁹

Wetlands: Wetland biologists have walked the entire pipeline corridor identifying wetlands. The route was originally selected in part because it minimized impacts on important wetlands. Subsequent route adjustments and "micrositing" have further reduced impacts on wetlands. Construction will cause temporary impacts to fewer than 16 acres of wetlands. Olympic will restore all impacted wetlands, and will enhance an additional 14 acres of wetlands to mitigate for the temporary impacts caused by construction.⁵⁰

Fish and Wildlife: The route has been selected to minimize impact on wildlife and sensitive habitat. Restricting the timing of construction will further minimize construction-related impacts to wildlife. Potential impacts to fish and aquatic resources will be minimized by

⁴⁷ Application § 1.4.2.1 and § 2.10

⁴⁸ Application § 1.4.3.1 and § 2.15.2.

⁴⁹ Katy Chaney Direct Testimony (Ex. 12) at 5; Application § 2.10.2 and § 2.14.3.

implementing erosion and sedimentation control Best Management Practices, by crossing rivers and streams by drilling or existing bridges in many cases, and by restricting the timing of invasive crossings to avoid impacts to fish.⁵¹ As Professor Brannon concluded, the "risk to fish species during construction would be low."⁵²

Vegetation: Much of the proposed route utilizes existing corridors where vegetation has already been disturbed. Impacts have been reduced by minimizing the width of the construction corridor. There are no threatened or endangered plant species within the corridor. Vegetation will be restored following construction and precautions will be taken to avoid the invasion or spread of noxious weeds. A five-year monitoring plan for upland vegetation will be developed and implemented.⁵³

Water Quality: Water quality impacts from the project will be minimal. Best Management Practices will be utilized to minimize erosion and sedimentation. Storm water runoff will be directed to sediment basins and allowed to evaporate. Discharges of hydrostatic testing water will be controlled to ensure that water quality is not impaired.⁵⁴

⁵⁰ Katy Chaney Direct Testimony (Ex. 12) at 5; see also Application § 1.4.8.3 and § 3.4.2.

⁵¹ Application § 1.4.8.8.

⁵² Ernest Brannon Rebuttal Testimony (Ex. 37) at 7.

⁵³ Application § 1.4.8.1; Katy Chaney Direct Testimony (Ex. 12) at 5.

⁵⁴ Application § 1.4.

Air Quality: Emissions associated with the proposed pipeline and terminal are minimal.

VOC emissions are estimated at 15.54 tons per year. In contrast, the loading of gasoline onto a single barge in Portland may result in the release of more than 5 tons of VOCs in one day.⁵⁵

Environmental Inspectors: Olympic will retain full-time environmental inspectors to monitor the construction of the pipeline. Olympic will also fund inspectors that will be supervised by and report to EFSEC. Olympic estimates that there will be between 50 and 100 inspectors working to ensure compliance with certification requirements.⁵⁶

Cultural & Tribal Resources: Professional archeologists or cultural resource specialists have surveyed approximately 97% of the route.⁵⁷ The route does not cross any archeological or cultural resource sites that have been listed on local, state or federal registers. Olympic continues to work with state, federal and tribal representatives to develop mitigation measures and a Programmatic Agreement to ensure the protection of cultural or tribal resources during construction.

Recreation: Construction of the pipeline will result in short-term impacts to recreational users of the John Wayne Pioneer Trail. Olympic will schedule construction to minimize

⁵⁵ Katy Chaney Direct Testimony (Ex. 12) at 7.

⁵⁶ Claude Harshbarger Direct Testimony (Ex. 7) at 14.

⁵⁷ Katy Chaney Direct Testimony (Ex. 12) at 8.

those impacts and will mitigate impacts by providing appropriate signage, detour routes and transportation.⁵⁸

EFSEC Should Recommend Certification

EFSEC should recommend certification of the Cross Cascade Pipeline. The pipeline will provide a safer, more reliable and more efficient means of transporting refined petroleum products from Western Washington refineries to Central and Eastern Washington. It will reduce the number of tanker trucks on crowded highways and dangerous mountain passes, and it will reduce the number of petroleum barges traveling in treacherous waters along the Washington coast and up the Columbia River. Moreover, the pipeline will provide significant economic benefits and cost savings to the citizens of Washington. The balance of "increasing needs for energy facility location and operation in conjunction with the broad interests of the public" tips plainly in favor of certifying the Cross Cascade Pipeline Project.

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⁵⁸ Katy Chaney Direct Testimony (Ex. 12) at 8.

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